

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Robert W. Stone (Bar No. 163513)

robertstone@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065

Telephone: (650) 801-5000

Fax: (650) 801-5100

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111

Telephone: (415) 875-6600

Fax: (415) 875-6700

*Attorneys for Defendant Corcept Therapeutics, Inc.*

[Additional Counsel Listed On Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

TEVA PHARMACEUTICALS USA, INC.,

Plaintiff,

vs.

CORCEPT THERAPEUTICS, INC., et al.,

Defendants.

Case No. 5:24-cv-03567-BLF

Honorable Beth Labson Freeman

**DECLARATION OF ROBERT W. STONE  
IN SUPPORT OF DEFENDANTS' REPLY  
IN SUPPORT OF JOINT MOTION TO  
STAY DISCOVERY PENDING  
RESOLUTION OF THEIR  
FORTHCOMING JOINT MOTION TO  
DISMISS**

Hearing Date: January 2, 2025 at 9:00 a.m.

1 I, Robert W. Stone, declare:

2 1. I am an attorney licensed to practice in the State of California and a member of the  
3 Bar of this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP, and serve as counsel  
4 for Defendant Corcept Therapeutics, Inc. in this action. I have been actively involved in this action,  
5 am familiar with the proceedings, and have personal knowledge of the matters stated herein. I  
6 respectfully submit this declaration in support of Defendants' Reply In Support of Joint Renewed  
7 Motion to Stay Discovery Pending Resolution of Their Forthcoming Renewed Joint Motion to  
8 Dismiss. If called as a witness, I could and would testify competently thereto.

9 2. On October 3, 2024, Teva served its First Set of Requests for Production of Documents  
10 to Corcept and First Set of Requests for Production of Documents to Optime (collectively, "First Set  
11 of RFPs").

12 3. Attached hereto as **Exhibit A** is a true and correct copy of Teva's First Set of Requests  
13 for Production of Documents to Corcept.

14 4. Attached hereto as **Exhibit B** is a true and correct copy of Teva's First Set of Requests  
15 for Production of Documents to Optime.

16 5. Teva's First Set of RFPs is highly expansive and burdensome. It includes 139 different  
17 requests for documents and data to Corcept and 92 requests for documents and data to Optime. Many  
18 of Teva's requests seek "All Documents and Communications" relating to a particular topic. Teva's  
19 First Set of RFPs likewise define the "Relevant Time Period" as February 1, 2012 to the present date.

20  
21 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
22 and correct.

23 Executed on this 4th day of October 2024 in Redwood Shores, California.

24  
25 By /s/ Robert W. Stone

26 Robert W. Stone  
27  
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